

SET ENVIRONMENTAL, INC.

*HOUSTON FACILITY
SITE PROFILE*

SET ENVIRONMENTAL, INC. SITE PROFILE

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SET ENVIRONMENTAL, INC.

SITE PROFILE

I. GENERAL INFORMATION

NAME: SET Environmental, Inc.

MAILING ADDRESS: 5738 Cheswood
Houston, Texas 77087

FACILITY ADDRESS: 5743 Cheswood
Houston, Texas 77087

TELEPHONE: (800) 598-7328 or (713) 645-8710

FAX: (713) 649-1027

CONTACTS: Dave DeVries
President

Walter C. Kilgus
Facility General Manager

Scott Skoog
Facility Engineer

Daniel A. Didier
Health Safety & Compliance Director

Pamela Page Nowlin
General Manager-Houston Field Services/Sales Manager

OFFICE HOURS: 8:00 a.m. to 5:00 p.m. (Weekdays)

RECEIVING HOURS: 8:00 a.m. to 4:00 p.m. (Weekdays)

II. SITE DESCRIPTION

LAYOUT

The facility is situated on a one (1) acre site and has three (3) permitted storage buildings (a map of the facility is included as Exhibit A):

1. Warehouse - used for various types of hazardous waste storage, drum cleaning, waste compaction and metal drum compaction. This storage building has a concrete base that is coated with an epoxy sealant. In order to prevent run-on, run-off and accumulation of rainwater this building is roofed, has walls and is surrounded by a six-inch high concrete curb. Six-inch high concrete curbs within the containment area are used to separate incompatible material. Each separate storage area has the capacity to contain a minimum of 10% of the volume of waste stored in that area and 100% of the largest container in that area.
2. Process Building - used for chemical treatment, compressed gas and lab pack processing. This storage building also has a concrete base, is roofed and has walls. A six-inch high concrete secondary containment curb also surrounds this building. This building houses two permitted container storage units (CS-1 and CS-3) and four chemical treatment tanks that will be described later (PT-2, PT-5, PT-11 and WW-2).
3. Ignitable Storage and Processing Building - used for the storage of flammable wastes in containers. This container storage area has a concrete base, is roofed and enclosed on three sides. The container storage area is sloped to a low point in the center of the building and has the capacity to contain a minimum of 10% of all waste and 100% of the largest container stored in this area. This building is divided into three separate permitted storage units (CS-4, CS-5 and CS-6) with a fourth to be permitted in the near future. Prior to 2009 this building housed 4 fuel blending tanks that have been clean closed and removed.

LOCATION

The facility is located outside the 100-year flood plain. The surrounding area within one mile of the facility is classified as mixed commercial, residential and industrial. The nearest home is 1,100 feet north, the nearest school is 3,500 feet southeast and the nearest surface water (Sims Bayou) is 7,250 feet southeast of the facility. There are no down gradient drinking water wells within one (1) mile.

SECURITY

A six (6) foot high chain link fence topped with three (3) strands of barbed wire encloses the entire facility. All gates are closed and locked using magnetic locks and/or case hardened chains and pad locks. On-site security personnel patrol the facility during non-operational hours. The facility has a CCTV Camera System. As required by 40 CFR 264.24, signs that state "Danger - Authorized Personnel Only" are posted on the perimeter of the site. These signs are posted in English and are visible from at least 25 feet.

FACILITY HISTORY

SET Environmental, Inc. was incorporated in the State of Illinois on April 4, 1979 and purchased the facility from Nuclear Sources and Services Inc. (NSSI) on April 8, 1988. At the time of purchase, the facility was under interim status and had been operated by NSSI since 1985.

The site was used for agricultural purposes up to 1930. Between 1930 and 1981 the property was privately owned. During this time no entities were identified that would suggest any on site industrial or commercial activities. Aerial photographs taken in 1969 and 1975 show the property to be vacant. Nuclear Sources and Services, Inc. (NSSI) purchased the property in 1981. NSSI began construction of the existing facility in 1985 for the purpose of hazardous waste treatment and storage.

Prior to purchasing the facility, SET Environmental hired an independent engineering and consulting firm to conduct a pre acquisition environmental risk assessment of the property. The assessment included sampling of soil and groundwater. There were no signs of contamination observed in the groundwater; however, low concentrations (highest level = 3.1 ppm) of PCBs were detected in the upper foot of soil at the southern most end of the facility. Soil core analysis at two and three foot depth did not show any contamination. The soil showing low concentrations of PCB's in the upper foot was excavated and disposed of in April of 1988.

SET Environmental, Inc. was issued a Part B Permit on October 4, 1990 from the Texas Natural Resource Conservation Commission and December 14, 1990 from the United States Environmental Protection Agency. SET Environmental's RCRA permit was renewed on August 12, 2002 and will expire on August 12, 2012. The facility name was changed from Treatment One, Division of SET Environmental to SET Environmental, Inc. in March of 2002 to better convey the comprehensive services offered by the company.

III. FINANCIAL INFORMATION

<i>CORPORATE OFFICE:</i>	SET Environmental, Inc. 450 Sumac Road Wheeling, Illinois 60090 (800) 634-6856 or (847) 537-9221
<i>FORM OF OWNERSHIP:</i>	Private Corporation
<i>COMPANY OFFICERS:</i>	Calvin Taming, CEO Bernard Taming, Secretary/Treasurer
<i>DUN & BRADSTREET NO:</i>	09-897-9297
<i>CLOSURE PLAN MECHANISM:</i>	Trust Fund (fully funded)
<i>CLOSURE COST ESTIMATE:</i>	\$556,740 (Last Update: December 2009)
<i>INSURANCE CERTIFICATE:</i>	See Exhibit B
<i>NUMBER OF EMPLOYEES:</i>	Approximately 210 (Total), 35 (Houston Facility)

IV. REGULATORY INFORMATION

USEPA ID NO: TXD055135388

STATE REGISTRATION NO: 50267

PART B PERMIT NO: HW-50267-001 (See Exhibit C)

SIC CODE: 4953 Refuse Systems
4953-01 Hazardous Waste Collection and Distribution

NAICS CODE: 562211

REGULATORY STATUS: SET - Houston is currently under no enforcement action by any regulatory body.

PERMIT WRITER: Texas Commission on Environmental Quality
Sarah Schreier, MC130
Waste Permits Division
Industrial and Hazardous Wastes Permits Section
P.O. Box 13087
Austin, TX 78711-3087

INSPECTION OFFICIAL: Texas Commission on Environmental Quality, Region 12
5425 Polk Avenue, Suite H
Houston, Texas 77023
Mr. Aron Athavaley (713) 767-3600

V. ADMINISTRATIVE INFORMATION

BACKGROUND OF KEY PERSONNEL:

Dave DeVries, President, B.S. Business Administration
1997 - Present - SET Environmental, Inc.
1994 - 1997 - General Manager; Treatment One
1991 - 1994 - General Manager; SET Environmental, Inc. - Remediation Division
1986 - 1991 - Various Positions; SET Environmental, Inc.

Walter (Chuck) Kilgus, Facility General Manager, B.S. Biology, Minor Chemistry
1998 - Present - SET Environmental, Inc.
1995 - 1998 - Environmental Field Services Manager, Treatment One
1991 - 1995 - Lab Pack Approvals Coordinator; Treatment One

Bob Mann, Facility Chemist, M.S. Chemistry
1989 - Present - SET Environmental, Inc.
1987 - 1989 - ENSCO; Chief Chemist

Scott Skoog, Facility Engineer, B.S. Chemical Engineering, PE
1995 - Present - SET Environmental, Inc.
1993 - 1995 - Operations Manager, Treatment One

1985 - 1993 - SET Environmental, Inc; Permitting

Daniel A. Didier, Health Safety & Compliance Director, B.S. Forestry
Certified Hazardous Materials Manager, 1993

1988 - Present – SET Environmental, Inc.

1986 - 1988 - SET Environmental, Inc; Project Manager

Pamela Page Nowlin, Sales Manager

1996 - Present – SET Environmental, Inc.

1992 - 1996 - Shipping, Receiving & Inventory/Administration Manager

1991 - 1992 - Canonie Environmental; Business Development Manager

1990 - 1991 - MSP Technical Service; District Account Manager

1986 - 1990 - Chemical Waste Management; Customer Service

BREAKDOWN OF EMPLOYEES BY DEPARTMENT:

Sales (off site)	4
Customer Service (off-site)	4
Waste Approvals	2
Finance & Billing (off-site)	2
Laboratory	2
Drum Processing	7
Lab Pack Processing	3
Shipping and Receiving	3
Cylinder Management	7
Maintenance	4
Compliance and Safety	1
Administration & Human Resources	8

VI. WASTE PROCESSING SYSTEMS

CHEMICAL TREATMENT: There are four tanks that make up the chemical treatment system. The tanks: identification numbers are PT-2, PT-5, PT-11 and WW-2; permit numbers are 8, 14, 9, and 15 and capacities are 1,700, 7,000, 1,615, and 6,500 gallons respectively.

All four tanks and associated ancillary equipment are:

- (1) Above ground;
- (2) Equipped with sealed secondary containment capable of containing the contents of the largest tank;
- (3) Equipped with agitators;
- (4) Inspected every three (3) years for integrity by an independent registered professional engineer, and are;
- (5) Inspected each workday by qualified facility personnel. The purpose of this inspection is to identify any leaks, corrosion or other system failure in the tanks, ancillary equipment and secondary containment.

PT-2 and PT-11 tanks and ancillary equipment are:

- (1) Equipped with corrosion protection (Kynar liners);
- (2) Equipped with agitators, pH, temperature and oxidation potential monitors;
- (3) Connected to an air emissions control system that is composed of a recirculating caustic counter current packed scrubber in line with an 8000-pound activated carbon bed;

The treatment processes designated for each tank are as follows: PT-2 is used for neutralization and hydrolysis, PT-5 is used for caustic solution storage, WW-2 is used for treated waste water storage and PT-11 is used primarily for hydrolysis of water reactive acids, oxidation/reduction and neutralization of liquids and gases.

GAS CYLINDER PROCESSING: SET Environmental, Inc. has a variety of scrubbing techniques used for the treatment and disposal and recycling of compressed gases. All processing activities take place under emission-controlled atmosphere. The use of PT-11 (Chemical Treatment Unit) allows for remote handling of gas cylinders. The flow of gases through the scrubbing systems is controlled from outside the treatment building, thereby eliminating potential exposure to the gases.

Several portable processing units are used for the treatment of compressed gases. Each primary treatment unit is equipped with a back-up unit of equal capacity. These portable processing units are connected to an air emissions control system consisting of a caustic scrubber to remove acidic fugitive emissions and venturi scrubber to remove particulates.

Two large enclosures, maintained under negative pressure are utilized while connecting compressed gas cylinders to manifold systems. One enclosure is connected to a caustic scrubber and the other is connected to 2-6000 pound activated carbon beds. Each system is designed to prevent employee exposure and

capture any potential fugitive emissions.

In addition to processing compressed gases, SET Environmental, Inc. has the capability to overpack or repack cylinders in poor condition and to process cylinders with inoperable valves.

VII. EMISSIONS CONTROL SYSTEMS

ACTIVATED CARBON BEDS: Three separate activated carbon beds are utilized throughout the facility. The following chemical processing areas have emissions controlled with activated carbon.

1. Lab Pack Processing Unit
2. Two chemical treatment tanks (PT2 and PT11)
3. Portable Gas Cylinder Processing Units

CAUSTIC SCRUBBERS: The facility has three caustic scrubbing units. Two are vertical, counter current, recirculating, packed towers. The third unit is a horizontal, caustic bath scrubber.

The following areas have emissions controlled with caustic scrubbers.

1. Chemical Treatment Tanks (PT2 and PT11)
2. Gas Cylinder Processing Units and Enclosures
3. Lab Pack Consolidation Enclosure

PARTICULATE SCRUBBERS: The facility utilizes a reverse pulse, high efficiency particulate filtration system (HEPA) to collect silica generated during the treatment of hydride gases. Connected to one of the caustic scrubbers is a venturi particulate scrubber to capture fine particulates generated from the treatment of acidic gases.

VIII. WASTE TREATMENT INFORMATION

WASTE MANAGEMENT METHODS: Neutralization, Oxidation/Reduction, Hydrolysis, Repackaging, and Storage.

PACKAGING REQUIREMENTS: SET Environmental, Inc. will only accept DOT authorized packagings for shipments of hazardous materials; non-hazardous materials may be shipped in non-DOT packagings. SET Environmental, Inc. Lab Pack and Gas Cylinder Protocols are available upon request.

UNACCEPTABLE MATERIAL: TSCA regulated PCBs, Radioactive Material, Explosives, Infectious Wastes and Dioxins.

EMPTY DRUM HANDLING: All drums are power washed and are either reused by SET Environmental, Inc. or are rendered unusable. Metals drums are crushed and sent off-site for scrap metal recycling. Poly drums are cut up and shipped off-site for land disposal.

IX. SAFETY AND TRAINING

TRAINING: SET Environmental, Inc. has developed a comprehensive training program structured into five areas: Administrative, Safety, Regulatory, Technical and Operational. Initial training includes 40 hours of classroom instruction. Each facility employee is certified by the American Red Cross in CPR/Standard First Aid. Continuing education includes a minimum of eight hours annual review complimented with monthly safety meetings.

MEDICAL MONITORING: SET Environmental, Inc.'s medical surveillance program includes a pre-employment and an annual physical examination as well as an examination upon any suspected exposure and upon termination of employment. A physician experienced in industrial medicine monitors medical surveillance results.

SAFETY EQUIPMENT: The facility is equipped with an intercom system capable of providing immediate emergency instructions to facility personnel. There are several phones immediately accessible near the point of operations that can be used to summon emergency assistance. Emergency response and first aid stations are located near each processing area. See Exhibit D for description emergency response equipment. Each building is equipped with an automatic fire suppression system. The system activates when thermal detectors are exposed to a temperature of 190°F or a temperature rise of 15° F in one minute or less. Once activated, an alarm sounds to evacuate employees and a monitoring service contacts the Fire Department. The facility is also equipped with a general alarm to aid in evacuation of the facility personnel for other emergencies. Activators are located in all facility exit routes.

X. LABORATORY INFORMATION

PERSONNEL: Experienced, degreed chemists staff SET ENVIRONMENTAL, INC.'s laboratory. SET's laboratory staff in Wheeling, Illinois provides additional laboratory and analytical support.

EQUIPMENT: The Houston lab is equipped with a flashpoint tester, a bomb calorimeter, halogen analyzers, muffle furnace, pH meter, Karl Fischer titration unit, hydrometer, FTIR, and centrifuge. The Wheeling lab is equipped with an infrared spectrophotometer and gas chromatograph, mass spectrophotometer.

WASTE ANALYSIS: A minimum of ten percent of the containers are sampled for each wastestream in each shipment, although SET Environmental, Inc. typically takes a composite sample of 100 percent of the containers. The sample is then analyzed to verify that wastes received are those described on the wastestream profile. Depending on the type of waste, analysis may include: % water, flashpoint, pH, BTU, %halides, specific gravity, reactive sulfide, reactive cyanide, suspended solids, dissolved solids, %ash, qualitative test for peroxides and oxidizer characteristics. Lab packs are unpacked and checked for conformance with approved lab pack inventories. If the waste stream or lab pack does not conform to previously approved paperwork, SET Environmental, Inc. will contact the generator in an effort to resolve the discrepancy. If the discrepancy requires further investigation, SET Environmental, Inc. will conditionally accept the waste if authorized by the generator until further analysis can be conducted. If the discrepancy

cannot be resolved (this rarely occurs) the waste will be returned to the generator or an alternate facility.

XI. RECORD KEEPING AND REQUIRED FORMS

INTERNAL RECORDS: The following records and documents are maintained by SET Environmental, Inc.: Container Inventory and Tracking System, Contingency Plan, Spill Prevention and Counter Measure Plan, Waste Minimization Program, Waste Analysis Plan, Inspection Schedule, Training Documentation.

WASTE PROFILE: Waste Profile sheets are required for each individual wastestream.

LAB PACK INVENTORIES & SUMMARY: Lab Pack inventories must be submitted with a Lab Pack summary form signed by the packaging agent and generator for each Lab Pack project.

CYLINDER PROFILE: Cylinder Profiles must be submitted with each batch of cylinders for approval. In addition to the completed Gas Cylinder Profile, a Gas Cylinder Inspection and Evaluation Report must be completed and attached to the Profile. The Gas Cylinder Profile must be signed by the packaging agent and generator. If at all possible, include pictures of each cylinder.